

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

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JAMES M. BAKER, On behalf of himself and all  
others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,  
KENNETH A. VECCHIONE, RICHARD K.  
STRUTHERS, CHARLES C. KRULAK, JOHN  
R. COCHRAN, III, MICHAEL G. RHODES,  
LANCE L. WEAVER, and JOHN W.  
SCHEFLEN,

Defendants.

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Case No. 1:05-cv-00272-GMS

CLASS ACTION

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ROCHELLE PHILLIPS, On behalf of herself and  
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS, and  
KENNETH . VECCHIONE,

Defendants.

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Case No. 1:05-cv-00277-GMS

CLASS ACTION

(Additional Captions Set Forth Below)

**DECLARATION OF RALPH SIANNI IN SUPPORT OF THE MOTION OF ACTIVIST  
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL  
OF ITS SELECTION OF LEAD COUNSEL**

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ROBERT WILKINS, Individually and on behalf  
of all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,  
KENNETH A. VECCHIONE, RICHARD K.  
STRUTHERS, CHARLES C. KRULAK, JOHN  
R. COCHRAN, III, MICHAEL G. RHODES,  
LANCE L. WEAVER, and JOHN W.  
SCHEFLEN,

Defendants.

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Case No. 1:05-cv-00287-GMS

CLASS ACTION

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LEONARD BRONSTEIN, On behalf of himself  
and all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,  
KENNETH A. VECCHIONE, RICHARD K.  
STRUTHERS, CHARLES C. KRULAK, JOHN  
R. COCHRAN, III, MICHAEL G. RHODES,  
LANCE L. WEAVER, and JOHN W.  
SCHEFLEN,

Defendants.

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Case No. 1:05-cv-00289-GMS

CLASS ACTION

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GREG PENN, On behalf of himself and all others  
similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,  
KENNETH A. VECCHIONE, RICHARD K.  
STRUTHERS, and LANCE L. WEAVER,

Defendants.

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Case No. 1:05-cv-00293-GMS

CLASS ACTION

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CLIFFORD W. JONES, On behalf of himself and  
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS, and  
KENNETH A. VECCHIONE,

Defendants.

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Case No. 1:05-cv-00316-GMS

CLASS ACTION

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MICHAEL D. BLUM, On behalf of himself and  
all others similarly situated,

Plaintiff,

vs.

MBNA CORP., BRUCE L. HAMMONDS,  
KENNETH A. VECCHIONE, JOHN R.  
COCRAN, III, RICHARD K. STRUTHERS, and  
LANCE L. WEAVER,

Defendants.

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Case No. 1:05-cv-00372-GMS

CLASS ACTION

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THOMAS J. CUSSEN, On behalf of himself and	:	
all others similarly situated,	:	Case No. 1:05-cv-00389-GMS
	:	
Plaintiff,	:	<u>CLASS ACTION</u>
	:	
vs.	:	
	:	
MBNA CORP., BRUCE L. HAMMONDS,	:	
KENNETH A. VECCHIONE, RICHARD K.	:	
STRUTHERS, CHARLES C. KRULAK, JOHN	:	
R. COCRAN, III, MICHAEL G. RHODES,	:	
LANCE L. WEAVER and JOHN W. SCHEFLEN,	:	
	:	
Defendants.	:	
	:	
_____	X	

RALPH SIANNI, of full age, hereby declares under penalties of perjury:

1. I am associated with the law firm of Milberg Weiss Bershad & Schulman LLP. I submit this Declaration in Support of the Motion of Activest for Consolidation, Appointment as Lead Plaintiff, and Approval of Its Selection Of Lead Counsel.
2. Attached hereto as Exhibit A is a true and correct copy of the PSLRA notice published by counsel for plaintiff in the first-filed action on *Business Wire* on May 5, 2005.
3. Attached hereto as Exhibit B is a true and accurate copy of the PSLRA certification of Activest.
4. Attached hereto as Exhibit C is a chart analyzing Activest's financial interest in the litigation.
5. Attached hereto as Exhibit D is the firm resume of Milberg Weiss Bershad & Schulman LLP.

Dated: July 5, 2005

/s/ Ralph Sianni  
Ralph Sianni